

The Honorable Jessica G. L. Clarke
United States District Court Judge
Southern District of New York
500 Pearl Street
New York NY, 10007

Re: Rapaport v. Epstein, 24-cv-07439

Letter-Motion For Extension of Time to Respond and to Toll IPR 4(e) Period

Your Honor:

I am respectfully writing to request an extension of time to respond to the motions to dismiss filed by defendant Pallaki individually and jointly by defendants Iyer, Garrett, Weinberg and Nelms.

The due date is currently 2/27/2025 and I am respectfully requesting for it to be extended to 3/27/2025. This represents an extension of four weeks or precisely 28 days. This is my first request for an extension of this deadline. The reason for this extension is that I have received a significant amount of information since commencing this action, including with respect to transactions and occurrences which had not yet transpired at that time, and that I must perform all work alone as a *pro se* litigant. I have conferred with the aforementioned defendants and have obtained their consent for this extension with respect to the time to respond.

In congruence with such an extension of time to respond, I am also requesting that Your Honor toll the period for notice of an amendment of my pleading established by your Individual Practice Rule 4(e) I may make per FRCP Rule 15(a)(1)(B) so that it will end on 3/23/2025. This will match the extension for the deadline for response, and provide me with sufficient time to evaluate the motions filed in light of information received since the filing of the *Complaint*, including with respect to new transactions and occurrences.

Respectfully submitted,

/s/ Gideon Rapaport *pro se*
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